

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:

JETHRO AND JENNIFER THURSTON  
5187 MURFREESBORO ROAD  
LEBANON, TN 37090  
SSN: XXX-XX-0803/8042  
Debtors.

CHAPTER: 13  
CASE NO.: 20-00625  
JUDGE: MASHBURN

---

**THE DEADLINE FOR FILING A TIMELY RESPONSE IS: April 13, 2020.**  
**IF A RESPONSE IS TIMELY FILED, THE HEARING WILL BE: April 22, 2020, at 8:30 a.m. in Courtroom 1, Customs House, 701 Broadway, Nashville, TN 37203.**

---

**NOTICE OF MOTION TO APPROVE ATTORNEY TO REPRESENT THE JOINT DEBTOR AND THE ESTATE**

Counsel for Debtors have asked the court for the following relief: Motion to Approve Attorney to Represent the Joint Debtor and the Estate.

**YOUR RIGHTS MAY BE AFFECTED.** If you do not want the court to grant the attached motion by entering the attached order, or if you want the court to consider your views on the motion, then on or before the response date stated above, you or your attorney must:

1. File with the court your response or objection explaining your position. **PLEASE NOTE: THE BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF TENNESSEE REQUIRES ELECTRONIC FILING. ANY RESPONSE OR OBJECTION YOU WISH TO FILE MUST BE SUBMITTED ELECTRONICALLY. TO FILE ELECTRONICALLY, YOU OR YOUR ATTORNEY MUST GO TO THE COURT WEBSITE AND FOLLOW THE INSTRUCTIONS AT: <https://ecf.tnmb.uscourts.gov>.**

If you need assistance with Electronic Filing you may call the Bankruptcy Court at (615) 736-5584. You may also visit the Bankruptcy Court in person at: US Bankruptcy Court, 701 Broadway, 1<sup>st</sup> Floor, Nashville, TN (Monday - Friday, 8:00 A.M. - 4:00 P.M.).

2. Your response must state that the deadline for filing responses, the date of the scheduled hearing and the motion to which you are responding is.

If a response is filed before the deadline stated above, the hearing will be held at the time and place indicated above. **THERE WILL BE NO FURTHER NOTICE OF THE HEARING DATE.** You may check whether a timely response has been filed by calling the Clerk's office at (615) 736-5584 or viewing the case on the Court's website at [www.tnmb.uscourts.gov](http://www.tnmb.uscourts.gov).

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: March 23, 2020

/s/ Scott D. Wilson

**SCOTT D. WILSON, NO. 20339**

Attorney for Debtor(s)  
405 1/2 A 31st Ave. N.  
Nashville, TN 37209  
Phone:(615) 297-2400  
Fax:(615) 634-0241  
[wilsonlgl@hotmail.com](mailto:wilsonlgl@hotmail.com)

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:	)		
	)	CHAPTER:	13
JETHRO AND JENNIFER THURSTON	)	CASE NO.:	20-00625
5187 MURFREESBORO ROAD	)	JUDGE:	MASHBURN
LEBANON, TN 37090	)		
SSN: XXX-XX-0803/8042	)		
Debtors.	)		
	)		
	)		
	)		

**MOTION TO APPROVE ATTORNEY TO  
REPRESENT THE JOINT DEBTOR AND THE ESTATE**

COME the Debtors, through counsel, and pursuant to 11 U.S.C. §1303, moves to approve Christopher Boiano, and the law firm of Boiano & Boiano, pursuant to 11 U.S.C. §327 and Rule 2014, F.R.B.P., to represent the Joint Debtor in the employment claims against CoreCiv. Pursuant to the attorney/client agreement between the Debtor and the law firm of Boiano & Boiano, attorney fees are thirty-three percent (33%) of any and all amounts recovered on behalf of the Debtor, plus out-of-pocket expenses or forty percent (40%) in the event the matter is resolved by a trial, plus out-of-pocket expenses.

The Joint Debtor attaches her attorney's statement pursuant to Rule 2014, F.R.B.P., as an exhibit hereto.

The Joint Debtor would be entitled to her exemption pursuant to T.C.A. 26-2-103 in the amount of \$6,800.00, any funds over and above that amount, which shall be net to the Joint Debtor, shall go to the Estate to be paid under the Plan.

Debtors' Counsel will apply for fees in the amount of \$200.00 pursuant to the Rights and Responsibilities entered between Counsel and the Debtors on January 30, 2020, for representation in this matter.

PREMISES CONSIDERED, the Debtor moves to approve Christopher Boiano and the law firm of Boiano & Boiano as attorneys for the Joint Debtor and the Estate.

Respectfully submitted:

/s/ Scott D. Wilson

**SCOTT D. WILSON, NO. 20339**

Attorney for Debtor(s)  
405 1/2 A 31st Ave. N.  
Nashville, TN 37209  
Phone:(615) 297-2400  
Fax:(615) 634-0241  
wilsonlgl@hotmail.com

**CERTIFICATE OF SERVICE**

I certify that on this 23rd day of March, 2020, I mailed/e-mailed a copy of the foregoing to Henry E. Hildebrand, III, the Chapter 13 Trustee, P.O. Box 340019, Nashville, TN 37203; the Assistant U.S. Trustee, 318 Customs House, 701 Broadway, Nashville, TN 37203; to the Debtor at the above-referenced address; to Christopher Boiano, Esquire, Boiano & Boiano, 115 Shivel Drive, Hendersonville, TN 37075; and to all filed creditors per the attached matrix.

/s/ Scott D. Wilson

**SCOTT D. WILSON, NO. 20339**

57 TOTAL USPS MAILINGS: \$57.00

**ADVANCED DISAGNOSTIC IMAGING**

PO BOX 292367  
Nashville TN 37229

**AES/PHEAA**

Attn: Bankruptcy  
Po Box 2461  
Harrisburg PA 17105

**AMERICAN MEDICAL RESPONSE OF TN**

50 SOUTH MAIN STREET, STE 401  
Akron OH 44308

**Ascendium Education Solutions, Inc**

PO Box 8961  
Madison WI 53708-8961

**Atlas Acquisitions LLC**

294 Union St.  
Hackensack, NJ 07601

**BIG PICTURE LOANS**

ATTN: CUSTOMER SUPPORT  
PO BOX 704  
Watersmeet MI 49969

**BRIDGECREST**

7300 E HAMPTON AVENUE, STE 101  
Mesa AZ 85209

**BUDDYS HOME FURNISHINGS**  
250 SEGLER DRIVE  
Oak Grove KY 42262

**CASHNET USA**  
175 WEST JACKSON  
SUITE 1000  
Chicago IL 60604

**Central Credit Services, LLC**  
9550 Regency Square Blvd  
Suite 500 A  
Jacksonville FL 32225

**Chase Card Services**  
Attn: Bankruptcy  
Po Box 15298  
Wilmington DE 19850

**Commonwealth Financial Systems**  
Attn: Bankruptcy  
245 Main Street  
Dickson City PA 18519

**CREDIT ONE BANK**  
PO BOX 60500  
City of Industry CA 91716-0500

**Debt Recovery Solution**  
Attn: Bankruptcy  
6800 Jericho Turnpike Suite 113e  
Syosset NY 11791

**Directv, LLC**  
by American InfoSource as agent  
PO Box 5008  
Carol Stream, IL 60197-5008

**Fingerhut**  
Attn: Bankruptcy  
Po Box 1250  
Saint Cloud MN 56395

**FIRST ACCESS**  
PO BOX 5220  
Sioux Falls SD 57117

**First Nataional Bank/Legacy**  
Attn: Bankruptcy  
Po Box 5097  
Sioux Falls SD 57117

**First PREMIER Bank**  
Attn: Bankruptcy  
Po Box 5524  
Sioux Falls SD 57117

**FOX COLLECTION**  
PO BOX 528

Goodlettsville TN 37070-0528

**Great Lakes Higher Education Corporation**

Attn: Bankruptcy  
Po Box 7860  
Madison WI 53707

**Great Lakes Higher Education Corporation**

c/o The United States Attorney's Office  
110 9th Ave S # A961  
Nashville TN 37203

**IC System, Inc**

Attn: Bankruptcy  
Po Box 64378  
Saint Paul MN 55164

**INTERNAL REVENUE SERVICE**

CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
Philadelphia PA 19101-7346

**J & L SALES AND RENTALS LLC**

PO BOX 146  
Paris TN 38242

**KNIGHT & HOOPER PLLC**

701 MARKET ST SUITE 700  
PO BOX 11583  
Chattanooga TN 37401-2583

**LEE & LEE ATTORNEYS AT LAW**

109 E GAY ST  
Lebanon TN 37087

**LVNV Funding, LLC**

Resurgent Capital Services  
PO Box 10587  
Greenville, SC 29603-0587

**Massey's**

c/o Creditors Bankruptcy Service  
P.O. Box 800849  
Dallas, TX 75380

**Medicredit Inc.**

Attn: Bankruptcy Department  
Po Box 1629  
Maryland Heights MO 63043

**Merrick Bank/CardWorks**

Attn: Bankruptcy  
Po Box 9201  
Old Bethpage NY 11804

**Midnight Velvet**

c/o Creditors Bankruptcy Service  
P.O. Box 800849  
Dallas, TX 75380

**MONROE CARELL JR. CHILDRENS HOSPITAL AT**  
VANDERBILT UNIVERSITY  
DEPT 1171 PO BOX 121171  
Dallas TX 75312

**MRS BPO LLC**  
1930 OLNEY AVENUE  
Cherry Hill NJ 08003

**Nationwide Recovery**  
501 Shelley Dr Ste 300  
Tyler TX 75701

**Navient**  
Attn: Claims Dept  
Po Box 9500  
Wilkes-Barr PA 19773

**Navient**  
c/o The United States Attorney s Office  
110 9th Ave S # A961  
Nashville TN 37203

**Paragon Revenue Group**  
Attn: Bankruptcy  
216 Le Phillip Ct Ne  
Concord NC 28025

**PHILLIPS & COHEN ASSOCIATES LTD**  
1002 JUSTISON ST  
Wilmington DE 19801

**PHOENIX FINANCIAL SERVICES LLC**  
PO BOX 361450  
Indianapolis IN 46236-1450

**PIONEER CREDIT RECOVERY INC**  
26 EDWARD STREET  
Arcade NY 14009

**RADIOLOGY ALLIANCE**  
PO BOX 440166  
Nashville TN 37244

**RECEIVABLES PERFORMANCE MANAGEMENT LLC**  
20816 44TH AVE W  
Lynnwood WA 98036

**Security Credit Services**  
Attn: Bankruptcy  
Po Box 1156  
Oxford MS 38655

**Seventh Avenue**  
c/o Creditors Bankruptcy Service  
P.O. Box 800849  
Dallas, TX 75380

**STENGER & STENGER**  
2618 EAST PARIS AVE SE

Grand Rapids MI 49546

**Tea Olive, LLC**

PO BOX 1931

Burlingame, CA 94011

**TENNOVA HEALTHCARE**

PO BOX 1280

Oaks PA 19456

**TENNOVA HEALTHCARE**

PO BOX 281384

Atlanta GA 30384

**THE HILL FIRM PLLC**

PO BOX 150529

Nashville TN 37215

**THOMAS THURSTON**

5187 MURFREESBORO ROAD

Lebanon TN 37090

**TN QUICK CASH**

408 S CUMBERLAND ST

Lebanon TN 37087

**Total Visa/Bank of Missouri**

Attn: Bankruptcy

Po Box 85710

Sioux Falls SD 57118

**Usdoe/glelsi**

Attn: Bankruptcy

Po Box 7860

Madison WI 53717

**Vance & Huffman Llc**

Attn: Bankruptcy

55 Monette Pkwy, Ste 100

Smithfield VA 23430

**VERIZON WIRELESS**

PO BOX 25505

Lehigh Valley PA 18002-5505

**Wakefield & Associates**

Attn: Bankruptcy

7005 Middlebrook Pike

Knoxville TN 37909

**World Finance Corp. c/o World Acceptance Corp.**

Attn: Bankruptcy Processing Center

PO Box 6429

Greenville, SC 29606